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American Cyanamid Company  
One Cyanamid Plaza  
Wayne, NJ 07470

FEDERAL EXPRESS

September 1, 1988

Dr. Walter Lee  
Project Manager  
CERCLA Removal Enforcement Section (3HW14)  
U.S. EPA, Region III  
841 Chestnut Building, 6th Floor  
Philadelphia, PA 19107

Re: Artel (Fike) Chemical - EPA Emergency Removal Action, Nitro, W.V.

Dear Dr. Lee:

In accordance with our meeting on August 27, 1988, this letter sets out the mutually agreed upon clarifications and additions to the Work Plans and Health and Safety Procedures submitted for your review on August 22, 1988 in satisfaction of the Consent Agreement and Order deemed effective as of August 15, 1988. This letter also summarizes conversations held with you and/or Mr. Gerald Heston, EPA On-Scene Coordinator (OSC) on August 29-30, 1988.

A. Sulfuric Acid Railroad Car GATX 59819

As per our work plan review meeting on August 27, EPA requested the following additions:

1. The Contractor, secured by Cyanamid, will comply with all aspects of the most updated EPA site safety plan. (Condition previously stated on page 2 of the Work Plan).

Implementation of this work plan is currently scheduled for the week of September 4, 1988.

2. EPA site personnel will monitor the RR car with a pyrometer for temperature differentials prior to the opening of the RR car by Cyanamid's Contractor.
3. EPA site personnel will conduct air monitoring downwind of the RR car during inspection.

B. Methyl Mercaptan Tank

Cyanamid will proceed with the implementation of Task I - Conduct Inspection and Evaluate Conditions of Storage Tank as soon as possible. It was agreed at our work plan review meeting that this task was essential to determine the tank's integrity prior to completing Task II - Select Transfer Method.

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The most expeditious method of completing the ultrasonic testing of the methyl mercaptan tank under Task 1 above is to utilize a manlift. Cyanamid's contractor will lease the manlift currently on site during the period of inspection.

Implementation of Task 1 above is currently scheduled for the week of September 4, 1988.

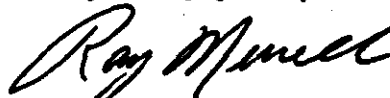
C. Small (500 gallon) vessel labeled "Methyl Mercaptan"

Cyanamid requested a sample of the tank's contents be obtained by EPA site personnel for analysis to confirm the tank's contents prior to any further discussions regarding the vessels disposition.

In summary, Cyanamid understands that the EPA has declared an Emergency Removal Action under CERCLA at the site and that time is of the essence for completion of agreed upon tasks. However, it is in the interest of all parties that removal of the methyl mercaptan proceed in the safest manner possible. We believe that our policy to conduct a HAZOP review involving a detailed evaluation of each step and related contingencies in the event of human or equipment failure is necessary. This HAZOP review will be conducted as soon as possible after detailed engineering plans are available from our consultant, ERM. Without compromising safety, every effort will be made to shorten the time schedule originally submitted to the EPA on August 22, 1988.

We request your signature on a copy of this letter approving the mutually agreed upon clarifications and additions to the work plans as outlined. This signature page may be returned to me via fax no. 201-831-8966. If there are any questions concerning the contents of this letter or the schedule, please contact me at (201) 831-2873.

Very truly yours,



R. C. Merrell  
Environmental Project Manager

RCM:sa  
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Reviewed and Approved by:

*All except C approved. Walt Lee*  
Dr. Walter Lee, US EPA

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